

Joseph P. and Susan D. Crowder Jr

June 14, 2006

Federal Trade Commission/Office of the Secretary, Room H-135
(Annex W)

Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

My husband and I were astonished to learn of proposed Business Opportunity Rule R511993. We don't know what impact this will have on our continuing as Independent Sunrider Distributors. One and a half years ago we began eating the Sunrider whole foods and using the skin care and household products. We enjoy all of the products and have had the greatest gain with the foods. Our health has improved tremendously; losing weight, a great reduction in pain, an unbelievable increase in energy. Many of our friends cannot believe the change Sunrider has made in our lives and are very interested and excited about trying the products. They too are seeing improving results in their own health due to adding Sunrider to their diet. In turn, they share Sunrider with others which helps build small home based businesses.

While we understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," some of the sections in the proposed rule will make it very difficult if not impossible for us to continue building our Sunrider business. For example, the seven-day waiting period to enroll new Distributors is a confusing and burdensome section of the proposed rule. We are not asking people to invest a lot of money. Sunrider's Starter Pack costs only \$140 and most of this goes for products. It isn't even a mandatory purchase to become an Independent Sunrider Distributor. People buy much more expensive items - automobiles, televisions, computers, gym memberships, and other items - do not have to wait seven days - and are only protected on their purchase with the 3 day contract termination.

In addition to the inconvenience, the waiting period gives the impression that there is something defective or deceptive about

the plan. Sunrider already offers the consumer protection with a 60-day return policy that is applicable to all products, including the Sunrider® Starter Pack. If a person changes their mind, they can get a full refund, therefore no risk is involved. Sunrider also has no monthly requirement and customers or members can stop buying anytime. Other companies have requirements. We have come across people who are interested in Sunrider, but they already have monthly, long-term obligations to another company. Even though they are unsatisfied with their current product, they are unable to purchase from another company.

Running a small business is complicated and time consuming. This law would add a huge burden in the area of added paper work that must be provided to new distributors and also reports that must be sent to Sunrider headquarters. It will add a lot of expense and running a small business is already an expensive undertaking. Also it will hurt our sponsoring people because they will not want the hassle. This will destroy our business growth.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It doesn't matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. If Sunrider were found guilty of wrongdoing, then it would make sense to disclose this information. If accused, and no guilt is found, our company and our business would be put at a disadvantage.

The proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. With identify theft becoming more and more common, this practice could harm more than it would help. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Sunrider headquarters and then wait for the list.

We were also surprised by the following stipulation. "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." Many people do not want their information (including myself) passed around to strangers, especially with identity theft being more prevalent.

My husband and I are not yet retired and both work a physical job. Our Sunrider business gives us a wonderful way to stay healthy and pay for our products with added income for retirement. Since I have been self-employed the last 17 years, I have no retirement income. I am thrilled to be able to help people in many ways(both in improving health and earning added income if they so chose). My husband and I are building this business in order to supplement his retirement income that we

hope will still be available.

While we appreciate the work of the FTC to protect consumers, we feel this proposed rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering our comments.

Sincerely,

Joseph P. Crowder Jr.

Susan D. Crowder

